

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
STEVEN HAROLD RYDELL	:	
KAREN ANN WHITNEY-RYDELL	:	
	:	CASE NO. 18-16489
Debtor	:	
	:	

MOTION TO MODIFY PLAN POST CONFIRMATION

AND NOW here come the Debtors, Steven Harold Rydell and Karen Ann Whitney-Rydell, by and through their undersigned counsel and hereby moves to amend the Chapter 13 plan as follows:

1. The Debtors filed their bankruptcy petition on September 28, 2018.
2. The Debtors' 2nd Amended Chapter 13 Plan was confirmed by Order of the Court on April 25, 2019.
3. In the Debtors' 2nd Amended Chapter 13 Plan, the Debtors proposed to pay back mortgage arrears in the amount of \$14,989.73, attorney's fees of \$3,000.00, 100% of unsecured debt totaling \$16,435.05 and estimated trustee's commission in the amount of \$2,831.48.
4. The Trustee's office recently advised undersigned counsel that the confirmed plan is underfunded in the amount of \$880.81 due to an increase in the Trustee's commission rate.
5. The Debtors desire to amend their plan post-confirmation to fully fund the plan to include the increased Trustee's commission.
6. There is no effect of the proposed plan on the distribution under the confirmed plan to each class of creditors.
7. A copy of the 3rd Amended Chapter Plan is attached hereto as Exhibit "A."

WHEREFORE, the Debtors, Steven Harold Rydell and Karen Ann Whitney-Rydell, hereby respectfully request that this Honorable Court grant the Motion to Amend the Chapter 13 Plan post confirmed.

Respectfully submitted,

FISHER & FISHER LAW OFFICES

DATED: August 22, 2019

/s/ Timothy B. Fisher, II
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